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IDAHO PUBLIC  
UTILITIES COMMISSION

**LISA D. NORDSTROM**  
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October 21, 2015

**VIA HAND DELIVERY**

Jean D. Jewell, Secretary  
Idaho Public Utilities Commission  
472 West Washington Street  
Boise, Idaho 83702

Re: Case No. IPC-E-15-19  
2015 Integrated Resource Plan – Idaho Power Company's Replacement  
Page 9 to Reply Comments

Dear Ms. Jewell:

On October 19, 2015, Idaho Power Company ("Idaho Power" or "Company") filed its Reply Comments in the above matter with the Idaho Public Utilities Commission ("Commission"). It has come to Idaho Power's attention that a citation was inadvertently omitted on page 9 of its Reply Comments. The Company believes that the omission of this citation led some stakeholders to believe that Idaho Power had changed its policy to pursue all cost-effective energy efficiency. The Company's position has not changed and it will continue to pursue all cost-effective energy efficiency. Idaho Power does not and has not viewed the achievable potential as a "ceiling" for the pursuit of cost-effective energy savings and will continue to pursue energy efficiency beyond the achievable potential when possible.

To correct this omission and prevent any potential confusion, Idaho Power wishes to replace page 9 of its Reply Comments with the enclosed page. A redlined version of page 9 with the citation is also enclosed for the Commission's and parties' ease of reference. Therefore, enclosed please find an original and seven (7) copies each of clean and redlined versions of replacement page 9 to Idaho Power's Reply Comments.

Please do not hesitate to contact me if you have any questions regarding this matter.

Very truly yours,



Lisa D. Nordstrom

LDN:csb  
Enclosures  
cc: Service List (w/encls.)

signed by Staff and Idaho's investor-owned utilities in January of 2010 and Order No. 28894 by using the TRC for cost-effectiveness. Additionally, the OPUC directs program administrators to use the TRC in determining cost-effectiveness of energy efficiency programs. Order No. 94-590 at 14. Because the IRP addresses system-wide planning, it would not be prudent to determine two levels of cost-effective energy efficiency between Idaho and Oregon. More importantly, the IPUC has not precluded the use of the TRC for determination of cost-effectiveness. The Company believes that in using the TRC to determine cost-effectiveness, the 2014 Energy Efficiency Potential Study identified an appropriate level of cost-effective energy efficiency and is compliant with commission orders in Oregon and Idaho.

ICL disagrees with the level of energy efficiency used in setting the load and resource balance. In its Comments, ICL states that Idaho Power could identify the amount of efficiency between the achievable and cost-effective (economic) level and that is the amount of energy efficiency the Company should strive to acquire. ICL Comments at 6.

Not all cost-effective energy efficiency is achievable. There is some level of energy efficiency measures that, regardless if they are cost-effective, will not be adopted by everyone. Idaho Power believes that the achievable potential as determined by AEG is just that, achievable, or "the upper limit for cost-effective energy efficiency savings."<sup>1</sup> There is no more "achievable" energy efficiency that is still cost-effective. Additional energy efficiency potential is a dynamic metric. If the cost of acquiring a cost-effective resource increases, it can become no longer cost-effective.

In its Comments, ICL encourages Idaho Power to improve program design, marketing, and customer engagement to go beyond the achievable energy efficiency

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<sup>1</sup> American Council for an Energy-Efficient Economy ("ACEEE"), August 2014 report, "Cracking the TEAPOT: Technical, Economic, and Achievable Energy Efficiency Potential Studies," page 8.

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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21<sup>st</sup> day of October 2015 I served a true and correct copy of REPLACEMENT PAGE 9 TO IDAHO POWER COMPANY'S REPLY COMMENTS upon the following named parties by the method indicated below, and addressed to the following:

**Commission Staff**

Karl T. Klein  
Deputy Attorney General  
Idaho Public Utilities Commission  
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P.O. Box 83720  
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☒ Hand Delivered  
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**Idaho Conservation League**

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**Snake River Alliance**

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**Sierra Club**

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Christa Barry, Legal Assistant